

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

NEXUS DISPLAY TECHNOLOGIES LLC,	§	Civil Action No: 2:14-cv-00762-RWS
	§	(Lead Case)
Plaintiff,	§	
	§	Jury Trial Requested
v.	§	
DELL INC.	§	Civil Action No: 2:14-cv-00762-RWS
LENOVO (UNITED STATES) INC.	§	Civil Action No. 2:14-cv-00763-RWS
	§	(Consolidated Cases)
Defendants.	§	

UNOPPOSED MOTION TO EXTEND DEADLINES

Plaintiff Nexus Display Technologies LLC (“Nexus”) hereby moves this Court for an extension of time for the parties to complete fact discovery and file motions to compel discovery from August 31, 2015 until September 7, 2015.

The parties respectfully request an extension of time to serve Expert Reports from September 9, 2015 to September 23, 2015 and Rebuttal Expert Reports from October 7, 2015 to October 21, 2015. The parties also request an extension to complete Expert Discovery from September 21, 2015 to November 4, 2015. In support of this motion, Nexus shows as follows:

1. On August 26, 2015, Defendants Dell Inc. and Lenovo (United States) Inc., filed an Opposed Motion to Extend Deadlines to File Letter Briefs Regarding Dispositive Motions Impacted by Claim Construction and to File Dispositive Motions or Motions to Strike Expert Testimony (Including Daubert Motions) (Dkt. No. 187) (“Defendants’ Motion”). While this Motion is not opposed, Defendants filed the Motion prior to hearing whether or not Nexus opposed the Motion, and as such filed it as opposed out of an abundance of caution.

2. Several discovery matters remain outstanding that will impact the case in general and Nexus’ ability to complete expert reports. These include (a) taking the depositions of Dell’s

30(b)(6) witnesses scheduled for September 1-2; (b) taking the deposition of Bruce Montag, a third party witness; and (c) securing business record affidavits from such third parties in lieu of a document custodian deposition, as well as other third party discovery including motion practice to secure third party documents. The parties agree that they cannot serve any further discovery on another party during this extension.

3. If the Court grants Defendants' Motion, the schedule allows for the extension of the discovery deadline and expert witness deadlines.

4. Nexus is not proposing to extend the trial date.

5. Defendants are unopposed to the relief requested in this motion so long as they receive a comparable extension.

Dated: August 31, 2015

Respectfully submitted,

/s/ Amir Alavi

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**ATTORNEYS FOR PLAINTIFF NEXUS
DISPLAY TECHNOLOGIES LLC**

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for Defendants Dell, Inc. and Lenovo (United States) Inc. regarding the relief sought in this motion, and they are unopposed.

/s/ Amir Alavi
Amir Alavi

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 31, 2015.

/s/ Amir Alavi
Amir Alavi